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December 7, 2010

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**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service, High Cost Universal Service  
Support  
CC Docket No. 96-45  
WC Docket No. 05-337

Connect America Fund  
WC Docket No. 10-90

National Broadband Plan  
GN Docket No. 09-51

Petition of Puerto Rico Telephone Company, Inc. and Puerto Rico Telephone  
Larga Distancia, Inc. For Waiver of Section 64.1903 of the Commission's  
Rules, WC Docket No. 10-52

Dear Ms. Dortch:

On December 6, 2010, Thomas Navin and the undersigned, on behalf of the Puerto Rico Telephone Company, Inc. ("PRT"), met with Zac Katz, Legal Advisor for Wireline Communications, International and Internet Issues to Chairman Julius Genachowski; Sharon Gillett, Lisa Gelb, Rebekah Goodheart, Patrick Halley and Amy Bender of the Wireline Competition Bureau; and Michael Steffen of the Office of General Counsel, regarding the above-captioned proceedings. PRT representatives discussed the Commission's recent *Sixth Broadband Deployment Report* and the finding that more Americans without access to broadband live in Puerto Rico than in any other U.S. state or territory. We explained that the high costs of serving an insular area combined with the exceedingly poor population on the island made deployment of broadband in Puerto Rico generally uneconomic in most areas without federal funding. PRT representatives noted that the company has offered two solutions to this problem, both of which are pending before the agency. The first is the establishment of a non-rural insular fund for high cost loop support, as requested in a petition for reconsideration in WC Docket No. 05-337. The second is a pilot program for funding



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broadband deployment through competitive procurements, which PRT proposed in its comments in response to the Connect America Fund NOI/NPRM in WC Docket No. 10-90. Representatives of PRT urged the Commission to move forward swiftly with either or both of these alternatives to enable the people of Puerto Rico to access telecommunications and information services currently enjoyed by most Americans in the mainland U.S. Doing so is necessary for Puerto Rico's future and is required by the Communications Act.

PRT representatives also inquired about the status of its pending waiver request in WC Docket No. 10-52 and expressed a preference for action by year end.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Nancy J. Victory

Nancy J. Victory

cc: Zac Katz  
Sharon Gillett  
Lisa Gelb  
Rebekah Goodheart  
Patrick Halley  
Amy Bender  
Michael Steffen